

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
Richmond Division

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|----------|--------------------------------|------------------------------------|
| In Re: | Robert Edwards) | |
| | Kimberly Edwards) | |
| |) | |
| Address: | P.O. Box 455) | <u>Case No.:</u> 3:14-BK-32544-KRH |
| | Mechanicsville, VA 23111) | |
| |) | Chapter 7 |
| SSN/TIN: | 2468) | |
| | 3842) | |
| |) | |
| | Debtors.) | |
| |) | |
| | John A. Drazenovich, et. al.) | |
| |) | |
| | Plaintiffs,) | |
| |) | |
| v. |) | <u>AP No:</u> 3:14-AP-3126-KRH |
| |) | |
| | Robert E. Edwards, et. al.) | |
| |) | |

MOTION FOR CONTINUANCE

COME NOW the Plaintiffs, JOHN and JENNIFER DRAZENOVICH, by counsel, and moves this Court for a Continuance, and in support thereof states as follows:

1. Counsel for Plaintiffs' is unable to attend the upcoming trial scheduled for March 10, 2015 due to the scheduled admittance of him to a hospital facility in Birmingham, Alabama, beginning on March 8, 2015 and discharge on March 13, 2015. Plaintiff's counsel does not have any alternative but to be admitted on the date referenced herein.

2. If Plaintiff's Motion for Continuance is not granted, the Plaintiffs will suffer severe harm because their selected counsel, who has represented them in this and all related matters over the course of several years, will be unavailable for the trial, or, alternatively, Plaintiff's counsel will be harmed because he will be unable to receive the medical treatment that he needs.

3. Plaintiff contends that Defendants will suffer at most nominal prejudice from the granting of the Continuance as prayed for herein.

WHEREFORE, your Plaintiffs respectfully pray that this Honorable Court will grant this Motion for Continuance.

Respectfully submitted,
JOHN & JENNIFER DRAZENOVICH

By: /s/ Stephen C. Lewis
Counsel

Stephen C. Lewis, Esq. VSB #45575
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CERTIFICATE OF SERVICE

I certify that on March 3, 2015, I electronically filed the foregoing via CM/ECF to the Clerk of Court, and such notification of filing will be delivered to counsel for Defendants, Robert and Kimberly Edwards:

Jason M. Krumbein, Esq. (By ECF)
Counsel for Defendants

Date: March 3, 2015

By: /s/Stephen C. Lewis.
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